

## Evaluation

### CEDAM QAP Recommendations/MSHDA's Proposed QAP

Based on CEDAM's July 18, 2007 *Summary of CEDAM Recommendations for MSHDA's Effort to Revise and Improve the LIHTC Qualified Allocation Plan (QAP)*, the charts below evaluate how MSHDA's August 24, 2007 release of the Proposed 2008-2009 QAP has responded to CEDAM's recommendations.

#### The QAP Revision Process

<b>CEDAM Recommendation</b>	<b>Balanced Dialogue and Forum for Discussion</b>
<b>MSHDA's Proposed QAP</b>	MSHDA, together with CEDAM, scheduled a discussion for August 30, 2007 as recommended by CEDAM.
<b>Evaluation</b>	CEDAM recommendation <u>incorporated</u> . Ongoing roundtables would further incorporate CEDAM's goals.

<b>CEDAM Recommendation</b>	<b>Consistency Over Time; Phase in Any Substantial Changes to the QAP</b>
<b>MSHDA's Proposed QAP</b>	Substantial change to QAP proposed for immediate implementation.
<b>Evaluation</b>	CEDAM recommendation <u>NOI</u> incorporated.

<b>CEDAM Recommendation</b>	<b>Commit to at Least Two (2) Funding Rounds Every Calendar Year; Including 2007</b>
<b>MSHDA's Proposed QAP</b>	Two (2) funding rounds scheduled for each year although not required. Second 2007 funding round incorporates new QAP standards (instead of retaining existing QAP) and delays funding further into 2008.
<b>Evaluation</b>	CEDAM recommendation <u>partially</u> incorporated.

<b>CEDAM Recommendation</b>	<b>Third Party Analysis of QAP Data; Sharing of Analysis</b>
<b>MSHDA's Proposed QAP</b>	No evidence that analysis has been or will be conducted/shared.
<b>Evaluation</b>	CEDAM recommendation <u>NOI</u> incorporated.

<b>CEDAM Recommendation</b>	<b>Provide Sufficient MSHDA Staffing to Reduce Waiting Period Between Application and Awards</b>
<b>MSHDA's Proposed QAP</b>	No evidence that staff has been increased. Proposed funding schedule increases wait time for award.
<b>Evaluation</b>	CEDAM recommendation <u>NOI</u> incorporated.

### Substance of QAP Revisions

<b>CEDAM Recommendation</b>	<b>Fairness; Reward Merit</b>
<b>MSHDA's Proposed QAP</b>	Although all MSHDA choices in the Proposed QAP are not clearly based upon a stated policy, a data-driven decision, or documented social and demographic factors, the Proposed QAP does contain greater rationale explaining MSHDA's priorities. The elimination of the lottery makes merit-based decisions more likely. However, the scoring system has not been provided. Finally, the allowance for correction of technical errors/clarifications increases fairness and MSHDA's ability to reward merit.
<b>Evaluation</b>	CEDAM recommendation <u>partially</u> incorporated.

<b>CEDAM Recommendation</b>	<b>Align the LIHTC Program with State Initiatives</b>
<b>MSHDA's Proposed QAP</b>	The Proposed QAP provides extensive background on state initiatives guiding the QAP.
<b>Evaluation</b>	<a href="#">CEDAM recommendation incorporated.</a>

<b>CEDAM Recommendation</b>	<b>Analyze and Put Holdbacks in Data- and Policy-Driven Context</b>
<b>MSHDA's Proposed QAP</b>	The Proposed QAP puts holdbacks in a policy-driven context. However, the holdbacks are not put in a data-driven context. No data regarding prior success or demonstrated need for holdbacks is provided
<b>Evaluation</b>	CEDAM recommendation partially incorporated.

<b>CEDAM Recommendation</b>	<b>Create a Cure Period for Minor Deficiencies</b>
<b>MSHDA's Proposed QAP</b>	"Cure period" provided for as part of Evaluation Criteria.
<b>Evaluation</b>	<a href="#">CEDAM recommendation incorporated.</a>

<b>CEDAM Recommendation</b>	<b>Extend Pre-Development Shelf Life</b>
<b>MSHDA's Proposed QAP</b>	No extension of shelf life. However, elimination of lottery makes need for extension less pertinent.
<b>Evaluation</b>	CEDAM recommendation partially incorporated.